

Exhibit 2

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24 **UNITED STATES DISTRICT COURT
25 NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

26 CHASOM BROWN, MONIQUE
27 TRUJILLO, WILLIAM BYATT, JEREMY
28 DAVIS, and CHRISTOPHER CASTILLO,
individually and on behalf of all similarly
situated,

29 Plaintiffs,

30 v.

31 GOOGLE LLC,
32 Defendant.

33 Case No. 4:20-cv-03664-YGR-SVK

34 **JOINT STIPULATION AND [PROPOSED]
35 ORDER REGARDING BRIEFING
36 SCHEDULE FOR DAUBERT MOTION
37 (DKT. 703) AND MOTION TO STRIKE
38 (DKT. 705)**

39 The Honorable Yvonne Gonzalez Rogers

40 Case No. 4:20-cv-03664-YGR-SVK

41 **JOINT STIPULATION AND [PROPOSED] ORDER REGARDING BRIEFING SCHEDULE FOR PLAINTIFFS'
42 DAUBERT MOTION AND MOTION TO STRIKE**

1 Pursuant to Civil Local Rule 6-2 and 7-12, this joint stipulation is entered into between
2 Plaintiffs and Google LLC (“Google”), collectively referred to as the “Parties.”

3 WHEREAS, on June 21, 2022, Plaintiffs filed their Motion for Class Certification (Dkt.
4 609);

5 WHEREAS, on August 5, 2022, Google filed its Opposition to Plaintiffs’ Motion for Class
6 Certification (Dkt. 665), as well as three *Daubert* motions (Dkts. 662, 663, 664);

7 WHEREAS, on August 23, 2022, Plaintiffs filed a *Daubert* motion (Dkt. 703) and a motion
8 to strike four Google employee declarations submitted in support of Opposition to Plaintiffs’ Motion
9 for Class Certification (Dkt. 705);

10 Whereas, Google’s oppositions to Plaintiffs’ *Daubert* motion and motion to strike are
11 currently due on September 6, 2022;

12 WHEREAS, any replies in support of Plaintiff’s *Daubert* motion and motion to strike are
13 currently due on September 13, 2022;

14 WHEREAS, the hearing on Plaintiffs’ motion for class certification as well as Google’s
15 *Daubert* motions is currently scheduled for September 20, 2022 at 2:00 p.m. (Dkt. 669);

16 WHEREAS, the hearing on Plaintiffs’ *Daubert* motion and motion to strike is currently
17 scheduled for September 27, 2022 at 2:00 p.m.;

18 WHEREAS, Google has requested an extension of its deadline for any oppositions to
19 Plaintiffs’ *Daubert* motion and motion to strike, from September 6 to September 14;

20 WHEREAS, Google has agreed to reciprocally extend the deadline for Plaintiffs’ *Daubert*
21 motion and motion to strike from September 13 to September 21;

22 WHEREAS, Plaintiffs wish to ensure that any changes to the briefing schedules do not result
23 in any change to the September 20 or September 27 hearing dates;

24 WHEREAS, Google has represented that it will not seek to reschedule the September 20 or
25 September 27 hearing date based on these stipulated changes to these briefing schedules;

26 NOW THEREFORE, the Parties stipulate to the following deadlines:

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- The deadline for Google to file its Opposition to Plaintiffs' *Daubert* motion and motion to strike (Dkts. 703, 705) is extended from September 6, 2022 to September 14, 2022.
- The deadline for Plaintiffs to file their Reply in support of their *Daubert* motion and motion to strike is extended from September 13, 2022 to September 21, 2022.

DATED: August 29, 2022

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

BOIES SCHILLER FLEXNER LLP

/s/ Draft

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Attorneys for Plaintiffs

1 **ATTESTATION OF CONCURRENCE**

2 I am the ECF user whose ID and password are being used to file this JOINT STIPULATION
3 AND [PROPOSED] ORDER. I hereby attest that each of the signatories identified above has
4 concurred in the filing of this document

5 Dated: August 29, 2022

6 By _____ */s/ Draft*
7 Draft

Counsel on behalf of Plaintiffs

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1 [PROPOSED] ORDER

2 Pursuant to stipulation of the Parties, the Court hereby **ORDERS**:

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- The deadline for Google to file its Opposition to Plaintiffs' *Daubert* motion and motion to strike (Dkts. 703, 705) is extended from September 6, 2022 to September 14, 2022.
- The deadline for Plaintiffs to file their Reply in support of their *Daubert* motion and motion to strike is extended from September 13, 2022 to September 21, 2022.

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12 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

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14 DATED: _____

15 _____
16 HON. YVONNE GONZALEZ ROGERS
17 United States District Judge
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